
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**AMCOR
FLEXIBLES
SINGEN GmbH**

CERTIFICATE
NUMBER

14

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

23 MAY 2022

DATE OF EXPIRY

22 MAY 2025

CERTIFIED SINCE

23 MAY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall'.

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Amcor Flexibles for the Amcor Flexibles Singen
site (Germany).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Amcor
ENTITY NAME	Amcor Flexibles Singen GmbH
CERTIFICATION SCOPE	Amcor Flexibles for the Amcor Flexibles Singen site (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (11 September – 19 October 2018 and 2 April 2019)• Re-Certification Audit (10 – 12 May 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 11 September – 19 October 2018 (On-site) and 2 April 2019 (Desktop follow up) (Initial Certification Audit)• 10 – 12 May 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 12 December 2018 and 13 May 2019 (Re-submitted following Desktop Audit) (Initial Certification Audit)• 1 July 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (11 September –19 October 2018 and 2 April 2019)</u> Audit scope covers Amcor Flexibles for the Amcor Flexibles Singen site (Germany).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Semi-Fabrication <p>All relevant Criteria from the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification Audit (10 -12 May 2022)</u> The audit scope covers Amcor Flexibles for the Amcor Flexibles Singen site (Germany).</p>

Supply chain activities included in the audit scope:

- Semi-Fabrication

All relevant Criteria from the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

23 May 2022 – 22 May 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

22 May 2023

CERTIFICATE
NUMBER

14

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to ASI Performance Standard legal compliance requirements. The Entity has systems in place to maintain adequate awareness of and to ensure compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has established adequate Anti-Corruption measures, such as Policies, training, Due Diligence checks and a whistleblowing line. The Entity's employees participate in web-based training related to Anti-Bribery and Corruption laws and regulations and improper payments compliance. Amcor's Anti-Corruption and Corruption Policy and Whistleblowing Policy and Charter are available at: https://www.amcor.com/investors/corporate-gov/policies-standards Reference to Amcor's Whistleblowing Service: https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html Amcor has disclosed further information on its Anti-Corruption and Bribery measures in its 2021 Sustainability Report, pages 44 and 45: https://www.amcor.com/sustainability-report
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles relevant to Environmental, Social and Governance performance. The Entity conducts regular training programmes for employees and raised awareness of the Code among business partners and suppliers. Further information is available in the 2021 Sustainability Report, page 45: https://www.amcor.com/sustainability-report Amcor's Code of Conduct is available at: https://www.amcor.com/investors/corporate-gov/policies-standards
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's Management Systems are ISO 14001 and ISO 45001 certified. It has systems, procedures and processes that conform to the Environmental, Social, and Governance practices of the ASI Performance Standard. For further detail: https://www.amcor.com/investors/corporate-gov/policies-standards

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has the endorsement and support from senior management who provide sufficient resources for regular review of the Policies and meeting the ASI Performance Standard requirements, as evidenced in management reviews.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated the Policies internally and externally which conform to the ASI Performance Standard requirement: https://www.amcor.com/investors/corporate-gov/policies-standards Workers understand the Entity's Policies and their duties.
2.2 Leadership	Conformance	The Entity has nominated a person at the senior management level who has overall responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support the implementation of the Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity holds a valid ISO 14001 certificate, a recognised Standard to meet this Criterion.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the Social Management Systems requirements. The Entity has an integrated Management System and holds a valid ISO 45001 certificate.
2.4 Responsible Sourcing	Conformance	Amcor has developed and implemented a Global Procurement Policy and a Supplier Code of Conduct: https://www.amcor.com/investors/corporate-gov/policies-standards The Entity has undertaken supplier risk assessments via EcoVadis and conducts second party Due Diligence audits at supplier sites. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. Further information is available in the 2021 Sustainability Report, pages 24-25: https://www.amcor.com/sustainability-report
2.5 Impact Assessments	Conformance	The Entity implements the capital expenditure and investments Due Diligence and impact assessment processes established at the corporate level. This includes the estimation of Environmental, Social, Governance and other aspects such as energy efficiency gains, health and safety considerations

CRITERION	RATING	COMMENT
		and impacts on labour rights, in consultation with the local Workers' council.
2.6 Emergency Response Plan	Conformance	The Entity holds valid ISO 14001 and ISO 45001 certificates and has implemented an emergency Response Plan. The Entity has aligned with local authorities to conduct joint fire drills. The Entity has undertaken extensive risk scenario planning, and the Singen fire department and Workers were consulted.
2.7 Mergers and Acquisitions	Conformance	The Entity has implemented Due Diligence processes regarding mergers and acquisitions which take into account Environmental, Social and Governance aspects. This process includes stage reviews for evaluation, preliminary assessments, and onsite assessments.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the closure, decommissioning, and divestment requirements. Processes are implemented for the environmental impact assessment and mitigation measures, and social planning and records for stakeholder consultation are established.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its material environmental, social, and economic impacts in the Amcor 2021 Sustainability Report which is aligned with Global Reporting Initiative (GRI) guidelines: https://www.amcor.com/sustainability-report Selected information disclosed in the report is independently assured. The Entity has undertaken a materiality assessment, disclosed in Exhibit 3, page 55.
3.2 Non-compliance and liabilities	Conformance	The Entity has provided information on non-compliances and liabilities in the Amcor 2021 Sustainability Report, page 33: https://www.amcor.com/sustainability-report
3.3a Payments to governments (legal and contractual)	Conformance	The Entity's payments to governments are regularly reviewed, and financial accounts are audited by PricewaterhouseCoopers (PwC) Germany.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>Amcor has a third-party operated whistleblower service which is available in every country where it operates and in the local language and considers cultural aspects:</p> <p>https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html Complaints are investigated by the Whistleblower Committee and are regularly monitored and evaluated. The Committee's Charter is available:</p> <p>https://assets.ctfassets.net/f7tuyt85vtoa/2Ykyct1HvhGNyJnDMuRLZv/68a3bfa249b46f9f299e2e4ee483d2e4/Whistleblower_Policy_and_Charter_-_May_2019.pdf</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has environmental Life Cycle Assessment (LCA) information available for all product lines for which Aluminium are considered and used. Amcor has developed a data-driven packaging design strategy, supported by its proprietary LCA software ASSET™ (Advanced Sustainability Stewardship Evaluation Tool). Further information is available in the 2021 Sustainability Report, page 26:</p> <p>https://www.amcor.com/sustainability/reports</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity has provided both cradle-to-gate and cradle-to-grave LCA information on its Aluminium (containing) products to customers upon request. Further information is available at:</p> <p>https://www.amcor.com/products/services/life-cycle-assessment</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity does not publicly communicate LCA information. LCA information is available upon request at following the link:</p> <p>https://www.amcor.com/products/services/life-cycle-assessment</p>
4.2 Product design	Conformance	<p>Amcor has sustainability objectives for its supply chain with packaging innovations that incorporate more post-consumer recycled, bio-based, and third-party certified materials. Further information is available in the 2021 Sustainability Report, pages 21-23:</p> <p>https://www.amcor.com/sustainability-report</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has implemented procedures to minimise the generation of Process Scrap via its Quality Management System which is certified to the ISO 9001 Standard. Where Process Scrap is generated,</p>

CRITERION	RATING	COMMENT
		the site collects 100% of the Scrap for recycling or reuse.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established alloy separation guidelines for departments and has developed processes to separate Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Amcor has established a target to achieve 10% use of recycled resins across their product portfolio by 2025. Amcor has several initiatives to assess material flows and enhance the recyclability of its products. Further information is available in the 2021 Sustainability Report, pages 22 and 27: https://www.amcor.com/sustainability-report
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Amcor has engaged with local, regional, national, and global Stakeholders to increase the collection and recycling of products containing Aluminium at end-of-life. Amcor works closely with a number of partners, such as the Ellen MacArthur Foundation (EMF), CEFLEX (A Circular Economy for Flexible Packaging), and SPC (Sustainable Packaging Coalition) as well as other regional initiatives focused on implementing effective and efficient recycling, such as IGORA (interest group for the collection and recycling of aluminium-based packaging in Switzerland) and DAVR (German Aluminium Packaging Recycling Association). Further information is available in the 2021 Sustainability Report, Exhibit 6, page 61: https://www.amcor.com/sustainability-report
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Amcor annually publicly discloses material Greenhouse Gas (GHG) Emissions and energy use by source. Further information is available in the 2021 Sustainability Report, pages 35 and 65-66: https://www.amcor.com/sustainability/reports The Entity reports site-level energy use and GHG emissions via Amcor's EnviroAction dashboard.
5.2 GHG emissions reductions	Conformance	The Entity has established a goal to achieve a 60% reduction in GHG Emissions intensity by 2030, inclusive of Scopes 1, 2, and 3, compared to the 2006 baseline. As of the end of FY21, Amcor had achieved 58% progress toward the 2030 goal, this is disclosed in the 2021 Sustainability Report, page 34: https://www.amcor.com/sustainability/reports

CRITERION	RATING	COMMENT
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has conducted daily and annual monitoring of Emissions to Air, as required by the local regulators and has invested in abatement equipment. The emission of Volatile Organic Compounds (VOCs) from Amcor's global production is presented in the Sustainability Report, page 35.
6.2 Discharges to Water	Conformance	The Entity has developed and maintained an Environmental Management System and is compliant with legal requirements on water discharges. The Entity has a valid ISO 14001:2015 certificate.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the ASI Performance Standard assessment and management of Spills and Leakage requirements.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has an external communication plan, which is included in the Emergency Response Plan. Regular training is provided to Workers on the emergency response procedures to manage Spills and Leakage. Further information is available in the 2021 Sustainability Report, page 31: https://www.amcor.com/sustainability/reports
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to ASI Performance Standard assessment and management of Spills and Leakage requirements. The Entity holds a valid ISO 14001 certificate. There have been no uncontrolled Spills incidents at the Entity during 2020/21.
6.4b Reporting of Spills (regular reporting)	Conformance	There have been no uncontrolled Spills incidents at the Entity since the last Audit.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed a Waste Management Plan and identified key waste streams generated during production (e.g., oil contaminated cloths, contaminated wood, and sprays). Amcor discloses its

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		waste management strategy and performance data in the 2021 Sustainability Report, pages 36-37: https://www.amcor.com/sustainability-report
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has published its operational waste (Hazardous and Non-Hazardous Waste) volumes in the 2021 Sustainability Report, pages 36-37: https://www.amcor.com/sustainability/reports
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use by source and type. A risk assessment, using the World Resources Institute (WRI) Aqueduct Water Risk Atlas, concluded a low risk classification. The Entity reports its water balance on an annual basis to Amcor Headquarters.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a risk assessment and defined its main uses of water and determined the site's location is within a low water stress region according to the WRI Aqueduct Water Risk Atlas.
7.2a Water management (management plans)	Conformance	The Entity has developed a water management plan with specific actions to reduce water consumption through upgraded systems and capital expenditure (CapEx) investments. The water management plan is updated on an annual basis.
7.2b Water management (monitoring)	Conformance	The Entity has monitored the implementation of the water management plan and reports water input and output information regularly at the Group level.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water use and water-related risks in the 2021 Sustainability Report, page 38: https://www.amcor.com/sustainability/reports
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken a Biodiversity risk assessment of the site's operations within its Area of Influence, which determined that the Entity has no material impact on biodiversity. The Entity has integrated biodiversity aspects into the Management System.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The Criterion is not applicable as the Entity has identified there were no material impacts and a Biodiversity Action Plan was not required.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The Criterion is not applicable as the Entity has identified there were no material impacts and a Biodiversity Action Plan was not required.
8.2c Biodiversity management (reporting)	Not Applicable	The Criterion is not applicable as the Entity has identified there were no material impacts and a Biodiversity Action Plan was not required.
8.3 Alien Species	Conformance	The Entity has established internal processes to prevent the accidental or deliberate introduction of

CRITERION	RATING	COMMENT
		Alien Species. This includes instructions for suppliers to treat wooden pallets according to the International Standards for Phytosanitary Measures No.15 (ISPM 15).
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity has implemented the Amcor Code of Conduct and Ethics Policy, which is regularly reviewed, communicated to Stakeholders, and adheres to the UN Guiding Principles on Business and Human Rights:</p> <p>https://www.amcor.com/investors/corporate-gov/policies-standards</p> <p>Amcor has a Modern Slavery and Human Trafficking Statement 2021:</p> <p>https://assets.ctfassets.net/f7tuyt85vtoa/n46ohuhrce/WxyWB8TFulV/37aa22c6cb24aeed0da514f099a3963f/FINAL_-_Amcor_2020_Modern_Slavery_Statement_-_170321.pdf</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has undertaken a Human Rights Due Diligence process that seeks to identify, prevent, mitigate, and account for how it addresses its actual and potential impacts on Human Rights at the site. The Due Diligence process conducted in January 2022 demonstrated that the Entity complies with the Human Rights requirements according to German law.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>Amcor has implemented a Whistleblower Policy and operates an independent whistleblower service that enables employees and external Stakeholders to anonymously report potential modern slavery-related concerns and other breaches of the Code of Conduct and Ethics Policy or Supplier Code of Conduct.</p>

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	Amcor has implemented initiatives to increase gender diversity and has reported publicly on gender diversity indicators such as the number of female/male Workers and female/male senior managers. Further information is available at Amcor's Talent through Diversity Policy: https://assets.ctfassets.net/f7tuyt85vtoa/21v1llh0xmoW88CGowuGWO/60b3e08c2357c0fce04b9e79f197f66b/Talent-through-Diversity-Policy.pdf
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply as Indigenous Peoples or their lands, territories and resources are not present in the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply as Indigenous Peoples or their lands, territories and resources are not present in the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion does not apply as no cultural heritage sites have been identified in the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion does not apply as no Resettlements have taken place.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion does not apply as no Resettlements have taken place.
9.7a Local Communities (rights and interests)	Conformance	The Entity has implemented an interested party and external communication procedure which identified relevant Stakeholders, their rights, and their interests. The Entity has raised awareness of the channels available to Local Communities and neighbours to contact the site.
9.7b Local Communities (impacts)	Conformance	The Entity has channels available to Community members, neighbours, or Visitors to report complaints or grievances. The Entity has identified the roles and responsibilities internally to respond to received complaints or grievances. The Local Community recognises the Entity as part of the business community and a major employer in the local area.
9.7c Local Communities (livelihoods)	Conformance	The Entity supports local charitable organisations with an annual community investment fund.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented a conflict minerals Due Diligence process and undertakes an EcoVadis supply chain risk assessment which identifies high-risk suppliers from a human rights perspective and has implemented adequate mitigation measures.

CRITERION	RATING	COMMENT
		Conflict-Affected and High-Risk Areas are included in the risk assessment.
9.9 Security practice	Not Applicable	The Criterion does not apply as the Entity does not directly employ security personnel.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to unite freely, seek representation and join Workers' councils without interference.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity guarantees the rights of Workers to Freedom of Association and Collective Bargaining in the Code of Conduct and Ethics Policy: https://assets.ctfassets.net/f7tuyt85vtoa/3puoDXcsE7tjGnHtNfwRTo/03f24c681ec2f1d091f830982bcb818d/Code-of-Buisness-Conduct-and-Ethics-2020.pdf
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the Entity does not operate in a country (Germany) where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use nor support the use of Child Labour as defined in ILO Conventions C138 and C182 and complies with related national and international law. The age of Workers is regularly checked as part of their onboarding process. The Entity requires its suppliers to respect all laws on Child Labour. Further information is available in Amcor's Modern Slavery Statement: https://assets.ctfassets.net/f7tuyt85vtoa/n46ohuhrCdWxvWB8TFuV/37aa22c6cb24aeed0da514f099a3963f/FINAL_-_Amcor_2020_Modern_Slavery_Statement_-_170321.pdf
10.2b Child Labour (hazardous)	Conformance	The Entity does not engage in or support Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in or support the Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, Protocol of 2014 to the Forced Labour Convention (P29) and C105. The Entity does not engage in or support Human Trafficking either directly or through employment or recruitment agencies. Further information is available in Amcor's Modern Slavery Statement:

CRITERION	RATING	COMMENT
		https://assets.ctfassets.net/f7tuyt85vtoa/n46ohuhrceWxvWB8TFulV/37aa22c6cb24aeed0da514f099a3963f/FINAL_-_Amcor_2020_Modern_Slavery_Statement_-_170321.pdf
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has developed, implemented, and maintained systems, Policies, and procedures to conform with the ASI Performance Standard requirements related to Forced Labour. The Entity does not accept deposits, Recruitment Fees, or equipment in advance from Workers through any employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force Workers to work in order to pay off debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not restrict Workers' freedom of movement, as confirmed by Worker interviews.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not confiscate Worker's original identification documents, only copies of these documents are retained in personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny the freedom of Workers to terminate their employment at any time without penalty.
10.4 Non-Discrimination	Conformance	The Entity has developed, implemented, and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Non-Discrimination. Further information is available in Amcor's Code of Conduct and Ethics Policy: https://www.amcor.com/investors/corporate-gov/policies-standards
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment (e.g., team briefings, info board, meetings with Worker representatives).
10.6 Disciplinary practices	Conformance	The Entity has developed, implemented, and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Disciplinary practices. The

CRITERION	RATING	COMMENT
		Entity operates a Whistleblower Policy and an independent hotline for confidential reporting. Amcor's Whistleblower Policy and Charter are available via the link: https://www.amcor.com/investors/corporate-gov/policies-standards
10.7a Remuneration (living wage)	Conformance	The Entity has developed, implemented, and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Remuneration. Wages are paid above the German legal minimum wage.
10.7b Remuneration (method of payment)	Conformance	The Entity has developed, implemented, and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Remuneration.
10.8 Working Time	Minor Non-Conformance	The Entity maintains a Management System to comply with Applicable Law related to public holidays and paid annual leave. However, 18% of employees have Overtime in their time bank account limits and there are no agreements with employees on how the reduction of hours can take place as described in the Collective Bargaining Agreement.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity holds a valid ISO 45001 certificate for its Occupational Health and Safety (OH&S) Management System.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity holds a valid ISO 45001 certificate for its Occupational Health and Safety (OH&S) Management System.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity holds a valid ISO 45001 certificate for its Occupational Health and Safety (OH&S) Management System.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity holds a valid ISO 45001 certificate for its Occupational Health and Safety (OH&S) Management System.
11.2 OH&S Management System	Conformance	The Entity holds a valid ISO 45001 certificate for its Occupational Health and Safety (OH&S) Management System.
11.3 Employee engagement on health and safety	Conformance	The Entity holds a valid ISO 45001 certificate for its Occupational Health and Safety (OH&S) Management System.

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	The Entity holds a valid ISO 45001 certificate for its Occupational Health and Safety (OH&S) Management System.

Document Control and Version History

Revision	Date	Notes
0	23 May 2019	Initial Certification Audit – Full Certification
1	5 August 2022	Re-Certification Audit – Full Certification Revised Audit Date and Report Submission date information to consolidate the initial on-site audit and the subsequent follow-up desktop audit as the Initial Certification Audit. Adjusted Audit Scope description for the Initial Certification Audit for consistency with the current format.